

Mark B. Bezilla Vice President - Nuclear 419-321-7676 Fax: 419-321-7582

July 26, 2005

Docket Number 50-346

License Number NPF-3

Serial Number 3165

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555-0001

Subject: Response to Request for Additional Information on Generic Letter 2004-02 (TAC No. MC4681)

Ladies and Gentlemen:

By letter dated March 4, 2005 (Serial Number 3128), the FirstEnergy Nuclear Operating Company (FENOC) submitted its initial response to Generic Letter 2004-02 for the Davis-Besse Nuclear Power Station (DBNPS). By letter dated June 2, 2005 (Log Number 6298), the NRC requested additional information regarding FENOC's response to Generic Letter 2004-02. The FENOC responses to this request are provided in Attachment 1. Attachment 2 provides a list of regulatory commitments made in this submittal.

Should you have any questions or require additional information, please contact Mr. Henry L. Hegrat, Supervisor - Licensing, at (330) 315-6944.



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The statements contained in this submittal, including its associated attachments, are true and correct to the best of my knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: Tuly 26, 205.

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Mark B. Bezilla, Vice President Nuclear

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Attachments

J. L. Caldwell, Regional Administrator, NRC Region III W. A. Macon, Jr., DB-1 NRC/NRR Project Manager C. S. Thomas, DB-1 NRC Senior Resident Inspector Utility Radiological Safety Board

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> FENOC Response to NRC Request for Additional Information Regarding Generic Letter 2004-02 Davis-Besse Nuclear Power Station

Request

By letter dated March 4, 2005, FirstEnergy Nuclear Operating Company (the licensee) provided the 90-day response to U. S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02 for Davis-Besse Nuclear Power Station, Unit 1. The GL requested that addressees perform an evaluation of the emergency core cooling system and containment spray system recirculation functions in light of the information provided in the GL and, if appropriate, take additional actions to ensure system function. Additionally, addressees were requested to submit to the NRC the information specified in the GL. The staff has completed its preliminary review of your response and has determined it needs the following additional information to complete our review:

As a result of review of the 90-day responses for all licensees and recent discussions with industry, the staff is concerned that some licensees may be delaying the evaluation of chemical effects until after the September 1, 2005, due date for the next response to the GL. This would result in an incomplete response and is not in accordance with the schedule in the GL. The Description of Methodology in Attachment 1 of your 90-day response does not list an evaluation of chemical effects. Although the GL did not specifically request that the evaluation of chemical effects be discussed in the 90-day response, please discuss your plans and schedule for evaluating chemical effects and verify whether your September 1, 2005, response will include such an evaluation.

Response

The NRC and the nuclear industry are examining the impact of chemical interactions on the long-term head loss correlation presently used in analyses. A test program is currently underway at the Los Alamos National Laboratory (LANL). While no finalized results have yet been published, initial information shows that there are, in fact, long-term chemical effects on the debris bed head loss. The testing is attempting to develop a correlation to permit quantification of these effects. At this time, it is not feasible to quantify the impact of the chemical effects. Since a quantitative assessment is not possible at this time, the Davis-Besse September 1, 2005 response will include a qualitative assessment of chemical effects. Additionally, following completion of the LANL testing program, a detailed evaluation of the chemical effects on the debris bed head loss will be performed.

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Supervisor - Licensing (330-315-6944) of any questions regarding this document or any associated regulatory commitments.

COMMITMENTS	DUE DATE
The Davis-Besse September 1, 2005 response will include a qualitative assessment of chemical effects	September 1, 2005
Following completion of the LANL testing program, a detailed evaluation of the chemical effects on the debris bed head loss will be performed.	N/A